

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

<u>LAURIE GILBERT,</u>)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-10746-RWZ
)	
<u>JOHN HEGGARTY and TIMOTHY DUBE,</u>)	
Defendants.)	

EXHIBIT LIST OF
DEFENDANTS JOHN HEGGARTY AND TIMOTHY DUBE

The Defendants, John Heggarty and Timothy Dube, intend to submit the following exhibits during trial in the above-referenced matter:

I. EXHIBITS DEFENDANTS INTEND TO EMPLOY BUT HAVE NOT REACHED AN AGREEMENT WITH PLAINTIFF REGARDING ADMISSIBILITY

The defendants propose to offer the following exhibits for which the Defendants have not yet been agreed-upon by the parties:

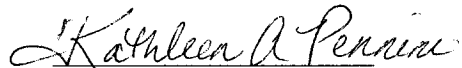
- A. Plaintiff's Response to the Defendants' First Set of Interrogatories;
- B. Plaintiff's Response to Defendants' First Request for the Production of Documents;
- C. Deposition of Laurie Gilbert;
- D. March 21, 2002 "Chemistry" laboratory results from Lakes Region General Hospital for Laurie Gilbert
- E. March 21, 2002 Emergency Room record from Lakes Region General Hospital for Laurie Gilbert

- F. March 21, 2002 Lakes Regional General Hospital Emergency Room
Walk-in/Care Record for Laurie Gilbert
- G. March 21, 2002 Lakes Region General Hospital Patient Record,
Emergency Department for Laurie Gilbert
- H. Record from Laurie Gilbert's July 14, 2003 office visit with Dr. Richard
O'Brien
- I. Record from Laurie Gilbert's March 24, 2003 office visit with Dr.
O'Brien
- J. Records from Laurie Gilbert's February 25, 2003 office visit with Dr.
O'Brien
- K. Records from Laurie Gilbert's July 24, 2003 office visit with Dr. O'Brien
- L. Complaint in Gregory Gilbert and Laurie Gilbert v. Joseph Parisi, Civil
Action No. 460-2003, Pike County Court of Common Pleas
(Pennsylvania)
- M. Complaint in Gregory Gilbert and Laurie Gilbert v. CPM Constructors,
Civil Action No. 96-481-B, District of New Hampshire
- N. Internet Movie Database.com (IMDb.com) biographical information for
Brad Garrett
- O. Evidence results
- P. September 17, 2002 report for Laurie Gilbert from Upper Valley
Neurology-Neurosurgery
- Q. June 5, 2003 Emergency Room Report from Lakes Region General
Hospital for Laurie Gilbert

R. Overtime Slip for Brenda Bartlett for March 18, 2002

The Defendants attempted to confer with Plaintiff's counsel concerning whether the parties would agree to the admissibility of any of the foregoing documents, but never received a response from the Plaintiff.

Respectfully submitted,
For the Defendants,
**JOHN HEGGARTY and
TIMOTHY DUBE,**
By their attorneys,



Matthew E. Dwyer
B.B.O. # 139840
Kathleen A. Pennini
B.B.O. # 654573
Dwyer, Duddy and Facklam, P.C.
Two Center Plaza, Suite 430
Boston, MA 02108
(617) 723-9777

CERTIFICATE OF SERVICE

I, Kathleen A. Pennini, hereby certify that I have sent this document on September 4, 2006, via electronic filing and facsimile, and in hand on September 5, 2006 to:

Richard N. Foley, Esq.
414 State Street
Portsmouth, NH 03801


Kathleen A. Pennini